



Norse Group Whistleblowing Policy and Procedure

Prepared by: HR



United in Purpose

Norse Group Limited – Nor-hur-pol-5 – Whistleblowing Policy and Procedure

Owner: HR

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1. Scope and Status

- 1.1 Working within the Norse Group ('Norse') and its subsidiary companies, an individual employee may be the first to realise there could be something wrong with the way in which the organisation is acting or proposing to act. However, employees may feel that speaking up would be disloyal to colleagues or to the organisation. Employees may also fear some form of retribution (often referred to as 'victimisation') should they decide to speak up.
- 1.2 The purpose of this policy is to make it clear that employees can raise concerns (often referred to as 'whistleblowing' or 'blowing the whistle') in confidence and without fear of victimisation. Norse is committed to the highest possible standards of trust, openness, integrity and accountability. The organisation therefore encourages employees to raise any concerns which they have, as soon as those concerns arise, in order that they can be considered and addressed as necessary. Norse would far rather than a genuine concern turns out to be mistaken or unfounded, than that improper conduct goes undetected or unaddressed.
- 1.3 Norse recognises employees may wish to seek advice and be represented by their trade union representative when raising a concern under the policy and acknowledges and endorses the role trade union representatives play in this area. Shop stewards acting in accordance with the policy and procedure will not suffer any detriment to their employment with the organisation.
- 1.4 This policy and procedure applies to all officers, employees and contractors working for Norse, including agency workers.
- 1.5 The policy has been prepared in order to ensure compliance with the letter and spirit of the Public Interest Disclosure Act 1998, with regard to the Government's guidance at www.gov.uk/whistleblowing and has been implemented in consultation with the relevant trade unions.

2. Policy Statements

- 2.1 This policy aims to:
- encourage employees to feel confident to raise concerns of a 'whistleblowing' nature;
 - provide appropriate mechanisms for employees to raise those concerns and to receive feedback on any action taken as a result;
 - reassure employees that they will be protected from any form of victimisation provided that any concerns which they raise have been raised in good faith.
- 2.2 The policy is not intended as an alternative mechanism for individuals to raise private concerns about their own employment or other working relationship with Norse. Such concerns should be raised under the appropriate procedure, for example the Grievance Procedure. Nor is it intended as a means for employees to question financial or

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operational decisions taken by Norse in the ordinary course of business. An employee, however, free to raise concerns under both this policy and another relevant procedure in appropriate circumstances.

- 2.3 An employee who acts in bad faith i.e. with a dishonest belief or purpose will not be protected under this policy.
- 2.4 Norse aims to design and implement policy documents that meet the diverse needs of our service, population and workforce, ensuring that none are placed at a disadvantage over others. It takes into account the provisions of the Equality Act 2010 and promotes equal opportunities for all. This document has been assessed to ensure that no one receives less favourable treatment on the protected characteristics of their age, disability, sex (gender), gender reassignment, sexual orientation, marriage and civil partnership, race, religion or belief, pregnancy and maternity.

3. Norse Commitment

- 3.1 Norse is committed to maintaining the highest standards of trust, openness, integrity and accountability across its business and recognises that employees have a key part to play in achieving and maintaining these standards. Norse is therefore committed to supporting employees and others who uphold these objectives whilst working for the organisation.
- 3.2 Norse recognises that the decision to report a concern can be a difficult one to make. However, an employee raising a relevant concern in good faith will be doing their duty to Norse and in turn to the public. Norse is therefore committed to ensuring that such employees are properly and adequately protected against any form of detriment as a result of speaking out or 'blowing the whistle'. Any harassment or victimisation of a whistleblower is likely to be regarded as gross misconduct and will result in disciplinary action against the person(s) responsible. The Public Interest Disclosure Act 1998 and the legislation which it amended also provides statutory protection for employees against dismissal or any other detriment.

4. Confidentiality

- 4.1 Any concerns which are raised will be treated in confidence and all reasonable efforts will be made to protect the identity of the employee raising concerns if they wish. In the event that Norse is not able to move forwards in relation to a concern without revealing the identity of the employee raising the concern, this will be discussed with the employees in question before any further action is taken.

5. Anonymous Allegations

- 5.1 Employees are encouraged to put their name to a concern raised whenever possible. Concerns raised anonymously are generally more difficult to investigate, evidence and address. Norse therefore encourages employees to provide their name when raising a concern, even if they do so together with an express request to remain anonymous. Norse will not disclose an employee's identity without their consent, unless there are

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legal reasons that require us to do so. For example, we may need to tell the police if a vulnerable person is at risk of being harmed.

- 5.2 Norse will also act on anonymous concerns where it is reasonably practicable to do so. The organisation would always prefer to know of the existence of a concern than to risk the concern going undetected due to the reluctance of members of employees to identify themselves.

6. The Responsible Officer

- 6.1 The Group HR Director has overall responsibility for the maintenance and operation of this policy. They will maintain a record of concerns raised and the outcomes, and such record will be regularly reviewed by the Norse board of directors.

7. How to raise a concern

- 7.1 'Whistleblowing' is the name given to the act of raising concerns about matters of a public interest i.e.: which affect the general public or a class of the general public. Relevant matters would be those involving, for the purposes of this policy, the organisation, and are as follows:
- that a criminal offence has been committed, is being committed or is likely to be committed by the organisation;
 - that the organisation has failed, is failing or is likely to fail to comply with any legal obligation to which it is subject;
 - that a miscarriage of justice involving the organisation has occurred, is occurring or is likely to occur;
 - that the health or safety of any individual has been, is being or is likely to be endangered by or in connection with the organisation;
 - that the environment has been, is being or is likely to be damaged by the organisation, or
 - that information tending to show any matter falling within any one of the preceding points has been, is being or is likely to be deliberately concealed.
- 7.2 Anyone with a relevant whistleblowing concern has a number of options as to how they might raise those concerns. Concerns may be raised orally or in writing, and may be raised with:
- 7.3 the employee's manager or, if this is not appropriate because they are involved in the matter of concern, their line manager; or
- 7.4 with any director of any Norse company involved in the matter (full details of Norse company directors can be found online at <https://find-and-update.company-information.service.gov.uk>)

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- 7.5 Alternatively, employees may choose to utilise the option of 'Speak Up', where they can raise a concern that will go directly to the HR department and then passed to the Group HR Director, or the SHEQ Director. To raise a concern via 'Speak Up', employees can either raise this via the HR Knowledge Hub, or email 'AskHR@norsegroup.co.uk, putting the subject header as 'Speak Up'.

8. How the organisation will respond

- 8.1 All concerns raised will be taken seriously and acted upon as soon as possible. An initial review of the concern will be undertaken promptly in order to decide whether a formal investigation or other action is appropriate and, if so, what form it should take. The overriding principle which Norse will apply is the public interest. Any concerns which more appropriately fall within the scope of a different procedures (eg: grievances, or complaints about bullying or harassment) will normally be referred for consideration under those procedures.
- 8.2 Following the initial review Norse will respond to the concerns as appropriate. The concern may:
- be actioned/investigated internally;
 - be referred to the police;
 - be referred to Norse's external auditor;
 - be referred to one or more of the Government's prescribed persons or bodies; and/or
 - be the subject of an independent inquiry.
- 8.3 It may not be necessary to seek any further information from the employee raising the concern. However, where an investigation requires the employee who raised the concern to be interviewed, they may be accompanied at any interview by their trade union, professional association representative or a work colleague. Meetings will be held off-site if this is necessary or desirable.
- 8.4 Save in exceptional circumstances, Norse aims to formally acknowledge any concerns raised within seven working days. Depending on the nature of the concern and the action being taken, it may not be possible or lawful to disclose much if any information thereafter. However, where reasonably practicable the employee raising the concern will be:
- advised broadly as to how Norse proposes to deal with the matter;
 - advised as to the likely steps involved in the process;
 - given an estimate as to how long it will take to conclude the matter;
 - notified of any procedural issues involving the employee and how it is proposed to address those issues; and/or
 - supplied with information on employee support mechanisms.

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- 8.5 Norse recognises that in order to ensure faith in this policy and its processes, employees need to be assured that any matters of concern have been properly addressed. Therefore, subject to any legal constraints and any data protection or other confidentiality issues, Norse will aim to inform employees in general terms of the outcome of any investigation/action in relation to concerns raised. Even if Norse does not take action, the information an employee provides is important and may help to shape Norse's strategy, operations and/or governance in the future.

9. How concerns can be taken further

- 9.1 Norse hopes that employees will be satisfied with the response and any action taken as a result of raising a concern under this policy. If they are not, and if they feel it is right to take the matter outside of the organisation, the following are possible contact points:
- trade union;
 - local Citizens Advice Bureau;
 - relevant professional bodies;
 - the Government's prescribed persons and bodies (found at <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>; or
 - the police.
- 9.2 If employees do take the matter outside the organisation, they should be careful not to disclose information which they are not entitled to disclose. If in doubt, advice can be sought from a legal advisor, a law centre, a trade union or the Citizens Advice Bureau.

10. Contacts

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